

Appl. No. : 09/557,278  
Filed : April 24, 2000

### REMARKS

Reconsideration and allowance of the above-referenced application are respectfully requested.

The drawings stand objected to as not showing the numerals 102, 140, 155 and 110. A proposed drawing correction is submitted herewith which adds those to the drawings.

The references 102 in Figure 3A and 210 in Figure 2 have been added to the specification. In addition, Figure 4 is amended herewith to remove the reference to a website.

Claims 2, 5, 6, 8 and 14 stand rejected under 35 U.S.C. 112, second paragraph, as allegedly being indefinite. Claim 2 has been canceled and incorporated into claim 1. The term "some aspect of" has been removed from claims 5 and 14. Claim 8 has been amended to add proper antecedent basis.

Claims 1-15 stand rejected under 35 U.S.C. 102(b) as allegedly being anticipated by Virga. In response, kindly consider the following.

Virga teaches a system, usable by fax machines, for encrypting an image. The entire teaching of Virga is that the images on paper are encrypted. Figure 4 shows a document encryption operation by optically scanning the document; see step 100 in Figure 10; and then encrypting that optically-scanned document.

In contrast, the present system as defined by amended claim 1, obtains text containing information and formatting information, uses that formatting information to format the text and produce an electronic file (as compared with Virga's paper) indicative of the formatted text, and then encrypting the electronic file. Claim 1 therefore

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defines that the encrypting is done electronically to an electronic file, as compared with Virga who apparently obtains a paper document and scans it. In contrast to Virga, the techniques of claim 1 define formatting information to form an electronic file, and then encrypting the electronic file indicative of the formatted information.

This is not in any way taught or suggested by Virga, which never teaches or suggests formatting information. Moreover, and also importantly, this goes against the established teaching in the art. The typical teaching in the art is that the text ITSELF, or the file containing the text ITSELF would itself be encrypted, not that the text is formatted using the formatting information and then that electronic file is encrypted. An advantage of this system is disclosed in the specification. Specifically, since the document or file has been formatted, it is less susceptible to decryption by frequency based techniques. In any case, Virga never teaches or suggests obtaining text and formatting information, forming the electronic file based on the text and formatting information, and encrypting the electronic file.

The rejection states that Virga teaches formatting information; referring to columns 6 lines 29-45. However, a review of this document portion shows that this is not a formatting system, but rather a scanning system that converts the document into a bitmap using the disclosed scanning system.

For all of these reasons, it is respectfully suggested that claim 1 should be allowable along with the claims which depend therefrom.

Claim 6 should be specifically allowable, as it defines changing the length or direction of the encrypting "to make it more difficult to the code the information without a key". Admittedly, Virga teaches compressing the length of the information, but does not

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teach changing a length or direction of the encrypting.

Claim 8 should be even further allowable, as it specifies variable length chunks. Virga teaches encrypting one line at a time and never teaches variable length chunks. In fact, this contention is based on hindsight and not on the teaching of Virga.

Claim 9 defines obtaining a text containing file, formatting that file into a display formatted form which is itself a file, and then encoding a chunk of that file. As discussed above, nothing in Virga is in any way suggestive of formatting a file, and then encoding that file and then encrypting this information. Claim 9 requires that a display formatted form text containing file is encoded and then encrypted. This is nowhere taught or suggested by Virga, and therefore claim 9 should be allowable for reasons discussed above with respect to claim 1.

Claim 11 should be additionally allowable, as in Virga never teaches varying the size of chunks.

Claim 13 has been amended to emphasize that the operation occurs in a file, thus further distinguishing over Virga for reasons discussed above. Claim 14 should be additionally allowable, as it specifies changing the decryption to prevent decryption by stitching. Nowhere does anything in Virga teach or suggest any kind of anti-stitching mechanism. Therefore, claim 14 should be additionally allowable.

It is believed that all of the pending claims have been addressed in this paper. However, failure to address a specific rejection, issue or comment, does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above are not intended to be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been

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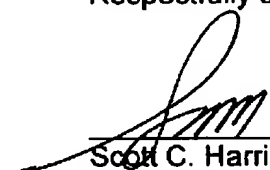
expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

For all of these reasons, it is respectfully suggested that all of the claims should be in condition for allowance. A formal notice of allowance is hence respectfully requested.

Please charge any fees due in connection with this response to Deposit Account No. 50-1387.

Respectfully submitted,

Date: 5-10-04

  
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Attachment: Drawing Change to Figure 1

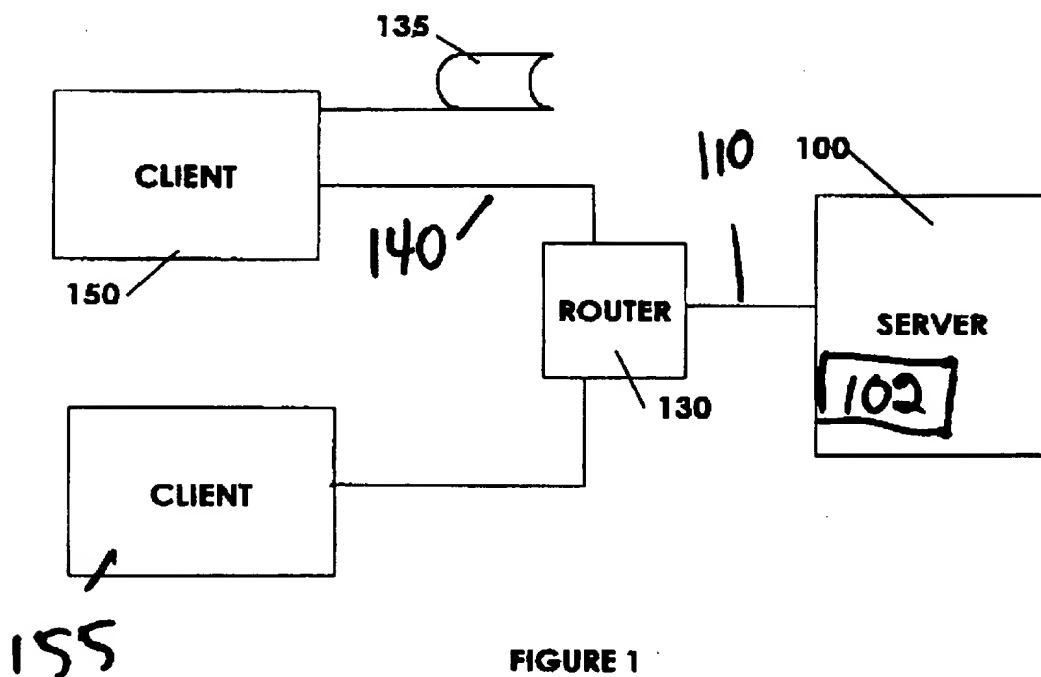


FIGURE 1